

KELLER BENVENUTTI KIM LLP
Jane Kim (#298192)
(jkim@kbbkllp.com)
David A. Taylor (#247433)
(dtaylor@kbbkllp.com)
Thomas B. Rupp (#278041)
(trupp@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: (415) 496-6723
Fax: (650) 636-9251

*Attorneys for Debtors and Reorganized
Debtors*

LAW OFFICES OF JENNIFER L. DODGE INC.
Jennifer L. Dodge (#195321)
(jdodgelaw@jenniferdodgelaw.com)
2512 Artesia Blvd., Suite 300D
Redondo Beach, California 90278
Tel: (310) 372.3344
Fax: (310) 861.8044

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

☒ Affects Pacific Gas and Electric Company

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF JENNIFER L.
DODGE IN SUPPORT OF
REORGANIZED DEBTOR PACIFIC
GAS AND ELECTRIC COMPANY'S
MOTION IN LIMINE NO. 4 TO
EXCLUDE INCREASED COST TO
REPLACE FLOORING SOUGHT BY
CLAIMANT TODD GREENBERG AT
TRIAL AT TRIAL OF CLAIM NO. 77335
(TODD GREENBERG)**

Trial: June 27, 2022
Time: 9:00 a.m. (Pacific Time)
Place: (Via Zoom Videoconference)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1
2 I, Jennifer L. Dodge, pursuant to Section 1746 of Title 28 of the United States Code,
3 hereby declare under penalty of perjury that the following is true and correct to the best of my
4 knowledge, information, and belief:
5

6 1. I am the owner and president of Law Offices of Jennifer L. Dodge Inc. and serve
7 as legal counsel for Pacific Gas and Electric Company (the “Utility”), as debtor and reorganized
8 debtor (“PG&E” or “Reorganized Debtor”) in the above-captioned Chapter 11 cases (the
9 “Chapter 11 Cases”), with regard to Proof of Claim number 77335 (the “Claim”) filed by Todd
10 Greenberg (“Greenberg” or “Claimant”). I have been a member of the California State Bar
11 Association since 1998 and am admitted to practice in the Northern District of California. I
12 submit this Declaration in support of *Reorganized Debtor Pacific Gas and Electric Company’s*
13 *Motion in Limine No. 4 to Exclude Increased Cost to Replace Flooring at Trial of Claim Number*
14 *77335 (Todd Greenberg)*, filed contemporaneously herewith.

15 2. Except as otherwise indicated herein, all facts set forth in this Declaration are
16 based upon my personal knowledge and my review of relevant documents and information. If
17 called upon to testify, I would testify competently to the facts set forth in this Declaration. I am
18 authorized to submit this declaration on behalf of the Reorganized Debtors.

19 3. In accordance with the Scheduling Order regarding Pre-Trial Objections and
20 Motions in Limine, I certify that I have complied in good faith with the meet and confer
21 requirements set forth therein and have met and conferred with counsel for Greenberg prior to
22 filing this Motion in Limine.

23 4. Attached hereto as Exhibit A is a true and correct copy of the condensed version of
24 the deposition of Claimant Todd Greenberg taken on May 13, 2022.

25 5. Attached hereto as Exhibit B are true and correct copies of photographs that I took
26 on May 17, 2022 during the duly noticed property inspection of the lower unit at 47 Bolinas
27 Road, Fairfax, California.
28

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
2 and correct to the best of my knowledge, information, and belief. Executed this 21st day of June,
3 2022.

4 
5 _____
6 Jennifer L. Dodge
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28